

C. DUKES SCOTT EXECUTIVE DIRECTOR



DAN E ARNETT CHIEF OF STAFF

Phone: (803) 737-0800 Fax: (803) 737-0801

July 19, 2005

VIA HAND DELIVERY

Mr. Charles L.A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission 101 Executive Center Dr., Suite 100 Columbia, SC 29210

> Notice of Election of Piedmont Natural Gas Company, Inc. for Re:

Application of the Natural Gas Rate Stabilization Act to Its Rates and

Charges

Docket No. 2005-125-G

Dear Mr. Terreni:

Enclosed for filing please find enclosed a copy of the Office of Regulatory Staff's First Continuing Data Request which was served on counsel for Piedmont Natural Gas Company, Inc. Please date stamp the extra copy enclosed and return it to me via our courier.

Please let me know if you have any questions.

Sincerely,

Benjamin P. Mustian

BPM/rng Enclosures

cc:

James H. Jeffries, IV, Esquire (w/enclosure)

Scott Elliott, Esquire (w/enclosure)

David Carpenter, Director (w/enclosure)

Tom Skains, President (w/enclosure)

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2005-125-G

IN RE:)	
)	
Notice of Election of Piedmont Natural)	
Gas Company, Inc. for Application)	CERTIFICATE OF SERVICE
Of the Natural Gas Rate Stabilization)	
Act to its Rates and Charges)	
)	

This is to certify that I, Rena Grant, an employee with the Office of Regulatory Staff, have this date served one (1) copy of the **OFFICE OF REGULATORY STAFF'S FIRST CONTINUING DATA REQUEST** in the above-referenced matter to the person(s) named below as addressed and shown below:

VIA FED EX PRIORITY OVERNIGHT

James H. Jeffries, IV

Moore & Van Allen, PLLC

100 North Tryon Street, Ste. 4700

Charlotte, NC 28202

David Carpenter, Director of Rates

Piedmont Natural Gas Company, Inc.

Post Office Box 33068

Charlotte, NC 28233

Tom Skains, President

Piedmont Natural Gas Company, Inc.

Post Office Box 33068

Charlotte, NC 28233

VIA U.S. MAIL

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205

Rena Grant

July 19, 2005 Columbia, South Carolina

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P.O. Box 11263 Columbia, S.C. 29211

Phone: (803) 737-0800 Fax: (803) 737-0801

July 19, 2005

VIA FED EX PRIORITY OVERNIGHT

James H. Jeffries, IV Moore & Van Allen, PLLC 100 North Tryon Street, Ste. 4700 Charlotte, NC 28202

David Carpenter, Director of Rates **Piedmont Natural Gas Company, Inc.** Post Office Box 33068 Charlotte, NC 28233

Tom Skains, President
Piedmont Natural Gas Company, Inc.
Post Office Box 33068
Charlotte, NC 28233

Dear Gentlemen:

Re: Notice of Election of Piedmont Natural Gas Company, Inc. for Application of the Natural Gas Rate Stabilization Act to Its Rates and Charges

Docket No. 2005-125-G

Please find enclosed and served on you three (3) copies of the Office of Regulatory Staff's First Continuing Data Request in the above-referenced matter. Pursuant to the South Carolina Public Service Commission Regulations, please provide responses to the Data Request within ten days.

Please let me know if you have any questions.

Sincerely,

Benjamin P. Mustian

BPM/rng Enclosure

cc:

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2005-125-G

IN RE: Piedmont Natural Gas Company, Inc.'s)
Election Under the South Carolina Natural)
Gas Rate Stabilization Act)

OFFICE OF REGULATORY STAFF'S FIRST CONTINUING DATA REQUEST

TO: ATTORNEYS FOR PIEDMONT NATURAL GAS COMPANY, INC.:

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves the First Continuing Data Request upon Piedmont Natural Gas Company, Inc. (hereafter referred to as "Piedmont" or "the Company").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service, the same to be served upon the undersigned at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify or provide a document, "identify" and "provide" means to provide a full and detailed description of

the document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUESTED:

- I. That all information requested below, unless otherwise specified, shall be limited to the Company's South Carolina Natural Gas Retail Operations for the period under review in this docket.
- II. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- III. That all responses to the data requests below be labeled using the same numbers as used herein.
- IV. That the requested information be bound in 3-ring binders with numbered tabs between each question.
- V. That if the information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce the information and place it in the Data Request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Jay Jashinsky or John W. Flitter, of the South Carolina Office of Regulatory Staff.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of the response provided.

- IX. That the Company provide ten (10) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that the Company provide an electronic version of the responses.
- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.
- XIV. All reconciliations and Accounting and Pro Forma adjustments shall be completed in a format which begins with Per Books amounts, shows all additions and/or subtractions being made, and ends with the As Adjusted amounts. Documentary support for each addition and/or subtraction shall accompany each such reconciliation, Accounting or Pro Forma adjustment.

REQUESTS

- 1.1 Provide copies of any Company correspondence, requests for data and responses, oral or written, from any other parties in this Docket.
- 1.2 Provide a copy of the Company's FERC Form 2 for the last two years.
- 1.3 Provide the number of customers at the beginning and the end of the test period by Rate Schedule.
- Provide the net "unaccounted for" gas in dekatherms and as a percentage of total gas purchases for resale for the latest five (5) calendar year periods ending December 31. Provide the net Company use gas in dekatherms and as a percentage of total gas purchases for resale for the latest five (5) calendar year periods ending December 31.
- 1.5 Provide a complete explanation, including work papers, of all accounting and proforma adjustments.
- 1.6 Provide a detailed computation for the cost of gas included in the Company's application for each proposed rate.

- 1.7 Provide the most current fully allocated cost of service study on a regulatory per books and pro-forma adjusted basis.
- 1.8 Provide the mark-up in dollars and cents for each presently approved rate schedule and each proposed rate schedule.
- 1.9 Provide the names of all officers, their titles and each individual's separate salary and bonuses for the past three (3) fiscal years and for the beginning and end of the test year.

1.10 Provide for the test year:

- a. The name of each officer whose salary and bonuses (shown separately) are allocated to the South Carolina gas operations of the Company, total salary and bonuses (shown separately) of each officer, and the amount of each salary and bonuses (shown separately) allocated, including a complete explanation to support each allocation.
- b. A complete description of each bonus program available to officers and other employees.
- 1.11 Provide a list of customer complaints received for the most recent three (3) calendar years. This list should identify the nature of the complaints (service, billing, gas leaks, etc.,) and complaints should be totaled for each year, by identity of the complaints, and grand totals.
- 1.12 Provide a list of reasons for the changes on the rate schedules in this filing.
- 1.13 Provide a listing of Uncollectibles for gas operations (dollars) by customer class for the most recent three (3) fiscal years and for the test period.
- 1.14 Provide a list of any new or expanded industrial load which was added to the system during the test period and where such load was not annualized. The list should identify the industrial customer, whether firm or interruptible, and show sales volumes by month.
- 1.15 Provide a comparison showing costs to customers, using present and proposed gas rates. This comparison should be based on the cost of gas applicable to billing rates effective April 1, 2005 (GCRM 113).
- 1.16 Provide the number of customers served under each present Rate Schedule, the number of bills rendered for each Rate Schedule, and the sales volume for each Rate Schedule and the per book revenues by month for the test period.
- 1.17 Provide tabulation, using approved and proposed rates, showing rates of return by rate

- schedule and classes of gas service based on the test year.
- 1.18 Provide the present margin and facilities revenue from each rate schedule and the additional margin and facilities revenue to be derived from the proposed rates for the test year.
- 1.19 Identify on a quantitative and/or qualitative basis the benefits to the ratepayers and to Piedmont from the development and implementation of each DSM program in South Carolina.
- 1.20 Provide a line graph comparison chart for the past three (3) years comparing Piedmont's interruptible rates by category of service with the monthly recalculated system supply commodity cost of gas, and the average prices of No. 2 fuel oil/per mmbtu, No 6 fuel oil/per mmbtu, and propane/per mmbtu used by industrial customers in the Company's South Carolina service areas. The graph should depict the prices on a monthly basis for each year.
- 1.21 For the test year, provide the sales volumes and revenue lost by curtailment category resulting from supplier/transportation curtailments.
- 1.22 Provide the top ten (10) stockholders of Piedmont Common Stock and the number of shares held by each.
- 1.23 Provide the annual dividend paid per Common share of Piedmont for each of the last three (3) years. What has been the percentage increase in dividend paid per Common share over the last three (3) years?
- 1.24 Provide the closing end-of-month market price of Piedmont stock for each month over the last three (3) years.
 - a. Note and adjust market price for all stock splits and stock dividends by date and provide information as to the type (i.e., 2:1, etc).
 - b. List the monthly market volumes of common shares traded on the market for the past five years and through the most recent month ending.
- 1.25 Provide the latest bond ratings by the major rating agencies and the forecasted financial direction indicated by each agency.
- 1.26 Provide the capital structure for Piedmont as of the end of each calendar year for the past three (3) years and at the end of the test period, and the latest available date. Include:
 - a. Class of capital (Common, Preferred, Long-Term Debt, etc.).
 - b. Amount (in dollars) of each class.
 - c. Ratio of each class of capital to the total capitalization.

- 1.27 Provide the embedded cost calculation for long-term debt for Piedmont at the end of each calendar year for the past three years, and at the latest available date.
- 1.28 Provide a listing of all outstanding issues of long-term debt as of the latest available date for Piedmont, including:
 - a. Type of obligation;
 - b. Interest rate;
 - c. Issue date;
 - d. Maturity date;
 - e. Amount of issue;
 - f. Net proceeds;
 - g. Effective interest rate;
 - h. Amount outstanding in each issue; and
 - i. The bond rating at the time of issue.
- 1.29 Provide and identify:
 - a. The latest market price of the ten (10) latest issues of long-term debt by Piedmont:
 - b. The current yield on the latest bond issue; and
 - c. Any debt issuances necessitated by non-regulated operations.
- 1.30 Provide a listing of the following for Piedmont for each calendar year for the past three (3) years:
 - a. Average number of common shares outstanding;
 - b. Book value per share;
 - c. Earnings per share;
 - d. Dividends per share;
 - e. Dividend payout ratio;
 - f. Return on equity (both average and year end equity);
 - g. Return on total assets;
 - h. Net income;
 - i. Net utility plant in service;
 - j. Dollar amount of dividends declared and paid;
 - k. Total operating revenue;
 - 1. Total revenue from non-regulated operations;
 - m. Total assets; and
 - n. Assets of non-regulated operations.

Note: Earnings per share, dividends per share, etc. should be adjusted for stock splits and stock dividends, if any.

1.31 Provide a listing of all planned or anticipated issues of Common and Preferred Stock

by Piedmont for the next four calendar years, by approximate date and amount of issue (in dollars and/or number of shares). Identify which, if any, of these issuances are necessitated by non-regulated operations.

- 1.32 Provide a listing of all stock issuances (common and preferred) since Piedmont's last rate case to the latest available date showing the following:
 - a. Date of issue;
 - b. Number of share;
 - c. Par value of shares issued;
 - d. Price per share at time of issuance;
 - e. Book value per share at time of issuance;
 - f. Gross proceeds;
 - g. Net proceeds; and
 - h. Whether issuance was necessitated by non-regulated operations.
- 1.33 Provide the last three years of the Company Prospectus, Proxy Statement, 10K, and Annual Report.
- 1.34 Provide the most recent copy of any financial reviews pertaining to Piedmont or any of its Subsidiaries (i.e. Merrill Lynch, Dean Witter, Duff & Phelps).
- 1.35 Provide the dollar value for the following items by fiscal year for the past three (3) years for total company operations of Piedmont Natural Gas Company and South Carolina operations:
 - a. Total utility plant in service;
 - b. Net utility plant in service;
 - c. Net operating income;
 - d. Net income;
 - e. Total Gas Revenues;
 - f. Gas supply expense;
 - g. Distribution expense-Operation;
 - h. Distribution expense-Maintenance;
 - i. Administrative and general expense;
 - j. Gas sales promotion expense; and
 - k. Demand-side management expense.
- 1.36 Provide a list of gas plant-in-service completed during the test year or under construction at the end of the test year. This list should include the actual or estimated total cost at present and the in-service or estimated completion date for each unit.
- 1.37 Provide an analysis of all construction projects comprising Construction Work in Progress (CWIP) at the end of the test year. Include the cost, brief description of construction, starting date, and expected completion date. Include project or estimate

number.

- 1.38 Give beginning balances, additions and retirements, and ending balances to plant-inservice for the test period for Piedmont Gas Operations.
- 1.39 Submit the following information as of the end of the test year (including the original purchase price):
 - a. Total amount of land owned by the Company included in its gas plant-inservice accounts; and
 - b. Complete breakdown of land maintained on Company's books as plant held for future use by Part of Parcel, date purchased, intended purpose, location, and date that it is expected to be placed in service.
- 1.40 Provide a calculation of the AFUDC rates that were used, by month, during the test year.
- 1.41 Provide the following data for Piedmont on an annual basis for the past three (3) years:
 - a. The ratio of AFUDC as a percent of income before interest charges (total company); and
 - b. The actual dollar amount of AFUDC (total company).
- 1.42 Provide a detailed analysis of all Deferred Debit and Deferred Credit Accounts at the end of the test year. Include description, account number and dollar amount.
- 1.43 Provide the calculation of the Cash Working Capital Allowance.

1.44 Provide:

- a. Detailed thirteen (13) month average for the balance in prepayments as used in the working capital computation. Use the same thirteen (13) month period as used for average tax accruals; and
- b. Schedule of prepayments as of the end of the test year showing payee, amount and account charged.

1.45 Provide:

- a. Beginning and Ending balances in Customer Deposits;
- b. Amount of Customer Deposits refunded during the test year; and
- c. Interest paid during the test year.
- 1.46 Provide a detailed schedule of accumulated deferred income taxes (ADIT) for the test year.

- 1.47 Provide a schedule of depreciation expense for the test year including depreciable plant categories and depreciation rates.
- 1.48 Provide the method and amortization period, if any, used for amortizing:
 - a. Any transition asset or obligation;
 - b. Unrecognized prior service cost; and
 - c. Unrecognized gains or losses.
- 1.49 Provide an analysis of the following accounts for the test period:
 - a. Account 930.2 Miscellaneous General Expenses;
 - b. Account 913 Advertising Expenses;
 - c. Account 930.1 General Advertising Expenses;
 - d. Account 426 Miscellaneous Income Deduction;
 - e. Account 426.1 Donations;
 - f. Account 909 Information & Instructional Expenses; and
 - g. Account 923 Outside Services Employed.

1.50 Provide:

- a. In comparative form for each account (include sub-accounts) in the Annual Report (FERC Form No. 2, pages 317-325), the total Company gas operating expense account balance for the last three (3) Calendar years; and
- b. In comparative form, the percentage increase over prior years for each account in (a) above.
- 1.51 Provide an analysis of employee salary expense:
 - a. Comparative analysis of gas employee salary expenses for each calendar year for the past three (3) years; and
 - b. Number of employees at the end of each calendar year for the past five (5) years.
- 1.52 Provide an analysis of employee benefits, including description, cost, and account charged for the past three (3) fiscal years and for the test year.
- 1.53 Provide a 13-month average of Materials and Supplies by month for the test year.
- 1.54 Provide an analysis of rate case expenditures in Docket 2002-63-G with expenditures associated with this filing as follows:
 - a. Date paid
 - b. Payee
 - c. Description
 - d. Amount

- 1.55 Explain how officer incentive compensation payments are determined.
- 1.56 Provide the following income tax data for Total Company and Gas Operations for the test year:
 - a. Federal Income Taxes:
 - i. Operating Federal Income Taxes Deferred;
 - ii. Depreciation;
 - iii. Federal Income Taxes Operating;
 - iv. Income Credits resulting from prior deferrals of Federal Income Taxes;
 - v. Investment Credit Net:
 - 1. Investment credit realized:
 - 2. Investment credit amortized-Pre-revenue Act of 1971; and
 - 3. Investment credit amortized-Revenue Act of 1971;
 - b. Reconciliation of book to taxable income and a calculation of the Federal Income Tax expense for the twelve months of the test year; and
 - c. The Company's calculation of test year State Income Tax expense.
- 1.57 Provide a description of the benefits included in the Company's OPEB expenses.
- 1.58 Provide the Company's Accumulated Post Retirement Benefit Obligation (APBO) at the end of the most recent calendar year.
- 1.59 Provide details of the Company's plans to fund or not to fund the OPEB liability.
- 1.60 Provide the account number and dollar amount of any unfunded OPEB liability contained on the Company's books.
- 1.61 Detail litigation expenditures, excluding rate case expenditures, for the last three (3) calendar years.
- 1.62 Give a description of the non-officer employees' incentive bonus programs and identify and quantify the dollars charged to Gas Operations for such programs for the test year. Explain any changes in incentive bonus programs from the test year used in Docket 2002-63-G.
- 1.63 Provide detail for all legal fees charged to gas operations for the test period including:
 - a. Person or Firm paid;
 - b. FERC Account number; and
 - c. Dollar amount.

- 1.64 Provide a listing by account number and test year dollar amount of Company expenditures for the following items to the extent that any of these expenditures have been charges to gas operations:
 - a. Contributions to charitable, civic, educational, etc., organizations;
 - b. Employee newsletter costs;
 - c. Memberships in Social and Athletic Clubs (including but not limited to Chamber of Commerce, Rotary, Lions, etc.);
 - d. Employee incentive awards;
 - e. Other employee awards, gifts, clubs, etc.;
 - f. Sponsorship of sports teams and/or other events;
 - g. Novelty or image building items such as combs, t-shirts, calendars, coffee mugs, etc.;
 - h. Benefits, which are recreational in nature (fitness, etc.);
 - i. Flowers;
 - j. Candy;
 - k. Luncheons and banquets;
 - 1. Penalties and fines:
 - m. Late payment charges; and
 - n. Employee clubs.
- 1.65 Provide the amount of unclaimed funds as of the end of the test year.
- 1.66 Identify any Statements of Financial Accounting Standard (SFAS) that were implemented during the test year. For each SFAS identified, please quantify the effect on test period revenues, expenses and rate base items.
- 1.67 Provide a schedule of any and all transactions with affiliates during the test period which were related to Gas Operations, exclusive of transactions under approved tariffs. Please include the dollar amount and account number for each affiliate.
- 1.68 Provide a schedule of pension expenses of the last three (3) years.
- 1.69 Provide a copy of the latest available actuarial letter supporting pension expense calculations.
- 1.70 Provide a schedule of any abandoned projects for the test year and indicate how they were accounted for.
- 1.71 Provide a schedule of injuries and damages for each of the last three (3) years and indicate how they were accounted for.
- 1.72 Provide a detailed schedule of Other Taxes (taxes other than income taxes) for the test year.

- 1.73 Provide beginning and ending test year number of customers in total and for each active rate schedules.
- 1.74 Identify the key factors impacting natural gas usage in the residential, commercial and industrial sectors during the past two years and explain the impact for each factor on usage.
- 1.75 Provide the test year total LPG storage capacity, stored volumes, and volumes of LPG injected into the system. Also show the months that injections occurred.
- 1.76 Provide allocation factors and basis for allocation (such as revenue, Plant-in-Service, etc.) for all components of Rate Base and/or Total Income For Return and Pro Forma and Accounting Adjustments, where allocation is not directly assignable, using Cost of Service Study methodologies.
- 1.77 Describe in detail how Piedmont Natural Gas Company assigns and/or allocates labor, material, office space, etc. between regulated and non-regulated operations. Explain the mechanisms by which Piedmont guards against any negative impacts to the ratepayer, such as cross subsidization, from its operations and financing of non-regulated activities.
- 1.78 For each year since the last South Carolina rate case, what percentage of total assets and total revenues of Piedmont Natural Gas Company have been related to non-regulated operations?
 - a. What percentage of total assets and total revenues in North Carolina, South Carolina, and Tennessee have been related to non-regulated operations?
 - b. What percentages (and amounts) are projected for the next three calendar years?
 - c. Identify the impact of non-regulated operations on the cost of equity capital of Piedmont Natural Gas Company.
- 1.79 Provide an organizational chart for Piedmont identifying and briefly describing each operating entity. Classify each operating entity as regulated or non-regulated.
- 1.80 Provide a statement describing Piedmont's lobbying activities and a schedule showing the name of the individual, salary, and all Company-paid or reimbursed expenses, or allowances, and the account charged for all Piedmont personnel or agents who, as a part of their function, contact legislators and other government agents, whether it is on the local, state, or national level.

- 1.81 Provide a hard copy of the most recent orders involving a general rate increase by the Company issued by the North Carolina and Tennessee Commissions.
- 1.82 Provide, for each of the Company's subsidiaries, regulated or non-regulated, the latest available Income Statement and Balance Sheet.
- 1.83 Provide the amount included in cost of service for Industry Association Dues, including the dues for each specific organization. Additionally, quantify the benefits to the ratepayer so that the costs associated with membership can be justified.
- 1.84 Please provide both printed and electronic versions of Piedmont's trial balance as of March 31, 2005, and a General Ledger for the twelve months then ended.
- 1.85 Please prepare a report which maps the Per Book amounts in Piedmont's *Net Operating Income and Rate of Return* (Schedule 7), by line number, of its March 31, 2005 Quarterly Monitoring Report to the trial balance.

Benjamin P. Mustian, Esquire

South Carolina Office of Regulatory Staff

PO Box 11263 (29211)

1441 Main St., Ste. 300 Columbia, SC 29201

(803) 737-0800

July 18, 2005